



December 22, 2017

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Ex Parte Presentation, Advanced Methods to Target and Eliminate  
Unlawful Robocalls, CG Docket 17-59, Call Authentication Trust Anchor,  
WC Docket No. 17-97.**

Dear Ms. Dortch:

On December 21, 2017, CTIA along with our members met with representatives of the Consumer and Governmental Affairs Bureau, the Enforcement Bureau and the Wireline Competition Bureau to discuss the above-captioned proceedings. A full list of meeting attendees is attached to this filing.

CTIA provided attendees with the attached Power Point presentation, which summarizes the items discussed. We discussed the wireless industry's innovations to help stop robocalls. In addition, we explained our support for a voluntary call-blocking framework with safe harbor protections and continued innovation to stop robocalls. Furthermore, we discussed our support for call authentication to combat illegal robocalls and asked the FCC to support industry work and encourage widespread adoption of call authentication protocols at home and abroad. Finally, we explained that a new reassigned number database would be complex and of limited utility.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being electronically filed with your office. If you have any questions regarding this submission, please contact the undersigned.



Sincerely,

/s/ Krista L. Witanowski

Assistant Vice President, Regulatory Affairs

cc: John B. Adams  
Jerusha Burnett  
Karen Schroeder  
Mark Stone  
Josh Zeldis  
Kristi Thompson  
Sherwin Siy



## ATTACHMENT

### **CTIA**

Harold Salters (Consultant for CTIA)

Melanie Tiano

Krista Witanowski

### **AT&T**

Linda Vandeloop

### **Sprint**

Keith Buell

### **T-Mobile**

Indra Chalk

### **Verizon**

Chris Oatway

### **Consumer and Governmental Affairs Bureau**

John B. Adams (by phone)

Jerusha Burnett (by phone)

Karen Schroeder

Mark Stone

Josh Zeldis

### **Enforcement Bureau**

Kristi Thompson

### **Wireline Competition Bureau**

Sherwin Siy



# The Wireless Industry is Committed to Working with the FCC to Stop Robocalls

December 21, 2017

# Wireless Industry's Multifaceted Approach to Robocalls

1. The Wireless Industry is Innovating to Help Stop Robocalls
2. CTIA Supports a Voluntary Call-Blocking Framework With Safe Harbor Protections, and Continued Innovation to Stop Robocalls
3. CTIA Supports Call Authentication to Combat Illegal Robocalls and Encourages the FCC to Support Industry Work and Encourage Widespread Adoption of Call Authentication Protocols at Home and Abroad
4. A New Reassigned Number Database Would be Complex and of Limited Utility

01

The Wireless Industry is Innovating to  
Help Stop Robocalls

# The Wireless Industry Is Focused on Preventing Robocalls

- The wireless industry, government, and consumers are all working to stop robocalls
- The wireless industry collectively blocks millions of robocalls per day and is continuing to innovate on new solutions to stop robocalls
- Spoofers, scammers, and other bad actors are the root cause of the robocalling problem. Industry and FCC must collaborate to help prevent robocalls from these bad actors to consumers

# The Wireless Industry Has Worked with Government to Stop Robocalls

## To prevent robocalls, the wireless industry has:

- Developed solutions with FCC and members of Industry Robocall Strike Force
  - Carriers and trade associations led this effort
  - Industry implemented recommendations from Oct. 2016 Strike Force Report, often on accelerated schedule
- Assisted the FCC and FTC with law enforcement investigations against robocallers
- Maintained relationships with call fraud bureaus that may initiate investigations after a suspected mass calling event

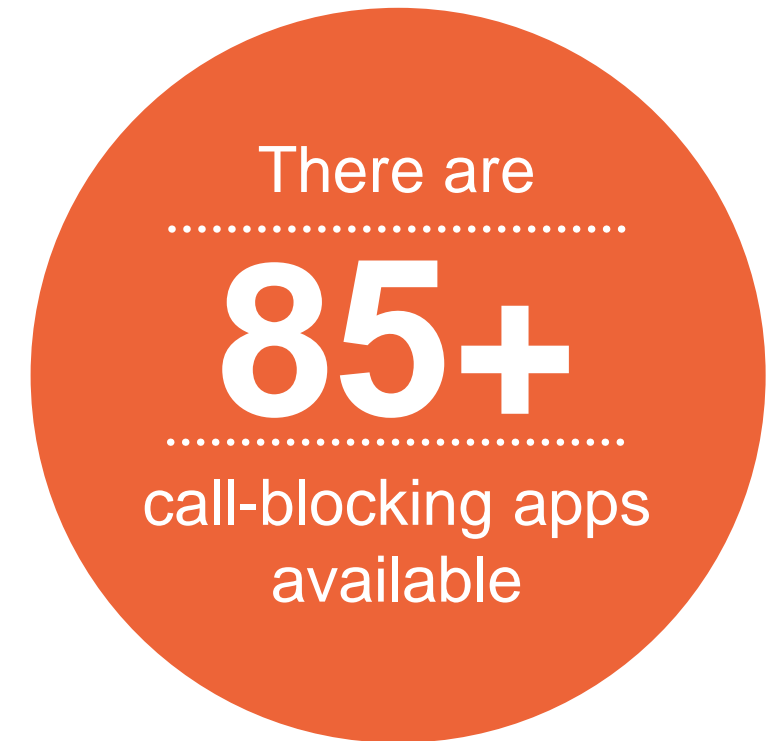




# The Wireless Industry Has Innovated to Help Stop Robocalls

## To prevent robocalls, the wireless industry has:

- Adopted new tools for customer use
  - Call blocking
  - Spam call predictions
- Leveraged the capabilities of the app ecosystem — there are over 85 call-blocking apps across all platforms available to help consumers block robocalls, including several offered to carrier customers at no charge



# The Wireless Industry Has Innovated to Help Stop Robocalls



Source: <https://www.ctia.org/consumer-tips/robocalls>

**To prevent robocalls, the wireless industry has:**

- Launched a CTIA webpage devoted to providing consumers instructions on how to stop robocalls
- Shared best practices in CTIA's Robocall Working Group and other associations
- Partnered with standards bodies like the ATIS and SIP Forum on the SHAKEN/STIR framework to authenticate phone calls
- CTIA Cyber Threat Information Sharing Pilot: New Automated Traceback Approach to Robocall Threat Information Sharing

02

CTIA Supports a Voluntary Call-Blocking Framework With Safe Harbor Protections and Continued Innovation to Stop Robocalls

## Safe Harbors and Continued Collaboration Are Necessary to Combat Unlawful and Unwanted Robocalls

**Consistent with the goal of helping customers control the types of calls they receive, the FCC should:**

- Enact a safe harbor that protects carriers who block calls
- Continue work with industry on new robocall solutions

# Burdensome New Processes or Complex New Infrastructure Won't Help Combat Unlawful and Unwanted Robocalls

**The FCC should reject calls to mandate burdensome new processes or create complex new infrastructure:**

- White lists create logistical and security challenges
- A centralized database or administrator would create complexity and expense without attendant benefit



A mandate to use particular approaches will stymie creativity by creating “Static measures...will likely be outpaced by the ingenuity of fraudsters and criminals.”

- First Orion Comments, at 3

# FCC Call Blocking FNPRM

- Preventing False Positives
  - Industry efforts are already underway to improve scoring/validation of robocalls
    - US Telecom hosted a workshop on November 3rd to begin the discussion on developing best practices for scoring and validating call originations and protecting legitimate calls
  - Care needs to be taken not to disincent carriers from ongoing call-blocking activities
  - Goal should be enhancing consumer choice in managing the calls they receive
- Measuring Effectiveness
  - Industry-wide data sources may provide a better means for developing effectiveness measures than voice service provider reporting
  - Measuring “illegal” robocall blocking requires content examination and may not be feasible

03

CTIA Supports Call Authentication to Combat Illegal Robocalls and Encourages the FCC to Support Industry Work and Encourage Widespread Adoption of Call Authentication Protocols at Home and Abroad

# The Wireless Industry Supports Call Authentication, Including Implementation of a Trust Anchor, To Combat Illegal Robocalls

U.S carriers need confidence in the digital certificates underlying call authentication and verification



The Commission should move quickly “to designate a governance authority and administrator so that the certification process envisioned by SHAKEN/STIR framework can get underway.”

- FCC Charman Ajit Pai



# Steps to Promote Effective Call Authentication

## **The FCC should:**

- Support industry leadership in promoting authentication including solving implementation issues via standards bodies
- Support voluntary implementation of authentication solutions
- Recognize that call authentication is a global problem and assert leadership to promote SHAKEN/STIR and encourage other nations to participate in call authentication efforts

# CTIA Recommends A “Hybrid” Trust-Anchor Governance Structure, Informed by Industry Consensus

- In a hybrid governance model, industry defines and operates the structure with regulatory endorsement from the FCC
- CTIA looks forward to participating on the NANC’s Call Authentication Working Group to explore Governance Authority (“GA”) structure
- The FCC/FCC-delegated GA should designate Policy Administrator responsibility to an industry-supported entity
  - Standards bodies can determine what entities have right structure/experience to oversee call authentication
- CTIA supports ATIS’ recommendations with respect to certification authorities and service provider requirements

# Possible Approaches: Role of Industry and FCC

## Regulatory Mandate

**FCC Directed:** Rules established and used by STI-GA (Secure Telephone Identify Governance Authority); Changes to governance rules require formal regulatory process

**Example:** NPAC

## Hybrid (recommended)

Industry defined and operated, with regulatory endorsement. Retains flexibility to respond to evolving robocalling “threat”.

**Example:** Administrative Council for Terminal Attachments (Part 68 reg)

## Industry Committee

**Industry Directed:** Industry creates and manages structure autonomously

**Example:** ATIS IMSI Oversight Council

# All other Operational and Policy Questions Should Be Addressed in an Industry Consensus Process

- The Joint ATIS and SIP Forum, via IP-NNI Taskforce, are working on implementation issues like enrollment and communication protocols
- Call authentication for modern networks should not be impeded by legacy system challenges

04

A New Reassigned Number Database Would  
be Complex and of Limited Utility



# Wireless Industry Efforts to Combat Unwanted and Illegal Robocalls

The wireless industry is making strides in attacking unwanted robocalls from bad actors

- Many of CTIA's members maintain call fraud bureaus that may initiate investigations after a suspected mass calling event
- Many CTIA members allow customer access to a variety of consumer-facing tools to mitigate illegal robocalls, such as network and cloud-based robocall blocking and scam detection software

# Wireless Industry Efforts to Combat Unwanted and Illegal Robocalls



Many carriers already work with third-party vendors that provide solutions to help businesses avoid calls to reassigned numbers

# Marketplace Solutions for Reassigned Numbers

Common attributes of TCPA compliance solutions available from Neustar, Danal, Payfone, Syniverse and others:

- Covers more than 90% of wireless subscribers
- Yields a positive, negative, or likelihood finding of consumer consent to receive robocalls
- Utilizes mobile carrier data
- Data is relevant and timely



# Marketplace Solutions for Reassigned Numbers

Establishing safe harbors around existing solutions can:

- Increase competition among solutions
- Enhance coverage, accuracy and timeliness of data
- Encourage adoption
- Mitigate TCPA risks for good faith callers

# A New Reassigned Number Database Would Introduce Unique Operational, Technical, and Financial Challenges

- Standing up a new database of reassigned numbers raises complex issues that will take significant time to resolve:
  - **Operational:** A continuously updated database requires carriers to establish new IT infrastructure and data feeds
    - Neither the FCC's Numbering systems (NRUF – Active/Assigned/Aging, but not "Reassigned") nor Carriers' possess the disconnected/reassigned numbers being sought
  - **Technical:** Creating interoperable solutions with strong privacy and security protections requires new resources
  - **Financial:** Any new database will impose significant monetary burdens on carriers and callers
- **Important:** A centralized database will not eliminate unwanted calls to reassigned numbers from bad actors

# CTIA Suggestions for Policymakers

- Maintain focus on combatting unwanted or illegal robocallers from bad actors through call authentication and blocking
- Revisit 2015 TCPA Declaratory Ruling and/or establish one or more safe harbors for good-faith callers using commercial TCPA solutions
- If FCC is determined to proceed with a new database, the FCC should consult the NANC on what is feasible, as the Commission's expert on numbering



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**Learn more at [ctia.org](https://ctia.org)**